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STIPULATION 1 WHEREAS, the Court previously dismissed Plaintiff's Complaint without prejudice for 2 lack of capacity, but permitted Plaintiff to amend their complaint by naming Baby Doe 1's guardian 3 as the plaintiff, provided that "Plaintiff's guardian must proceed under their actual name and Baby 4 Doe 1 must be identified by their initials" (ECF 817); 5 WHEREAS, Plaintiff Mandy Denton, as guardian for minor child B.M., filed a motion to 6 amend the complaint, as the Court permitted (ECF 850); 7 WHEREAS, the McKinsey Defendants have no objection to Plaintiff filing the Amended 8 Complaint, which proceeds using Plaintiff's actual name and identifies the child on whose behalf 9 Plaintiff is suing with their initials, as the Court directed (ECF 817, 850-1); 10 NOW, THEREFORE, the parties hereby agree and stipulate that Plaintiff may file the 11 Amended Complaint (ECF 850-1). 12 13 IT IS SO STIPULATED. 14 15 Dated: November 6, 2025 By: /s/ Mark David McPherson 16 MARK DAVID McPHERSON (SBN 307951) 17 mmcpherson@goodwinlaw.com GOODWIN PROCTER LLP 18 The New York Times Building 620 Eighth Avenue 19 New York, NY 10018 Telephone: (212) 813-8800 20 REBECCA L. TARNEJA (SBN 293461) 2.1 rtarneja@goodwinlaw.com **GOODWIN PROCTER LLP** 22 601 South Figueroa Street, Suite 4100 Los Angeles, CA 90017 23 Telephone: (213) 426-2500 24 JAMES L. BERNARD (pro hac vice) james.bernard@hoganlovells.com 25 JULIE G. MATOS (pro hac vice) julie.matos@hoganlovells.com 26 HOGAN LÖVELLS US LLP 390 Madison Avenue 27 New York, NY 10017 Telephone: (212) 918-3000 28

STIPULATION AND [PROPOSED] ORDER RE: PLAINTIFF'S AMENDED COMPLAINT

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